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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY \_\_\_\_\_

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS M. SHEPOS,

Defendant.

CR No. 18

18CR00569 RGK

I N F O R M A T I O N

[18 U.S.C. § 1001(a)(2): False  
Statements; 26 U.S.C. § 7206(1):  
Subscribing to False Tax Return]

The United States Attorney charges:

COUNT ONE

[18 U.S.C. § 1001(a)(2)]

On or about November 21, 2016, in Los Angeles County, within the Central District of California, in a matter within the jurisdiction of the executive branch of the government of the United States, specifically, the Federal Bureau of Investigation ("FBI"), defendant THOMAS M. SHEPOS ("SHEPOS") knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation to two Special Agents of the FBI, in that defendant SHEPOS represented that he had not received money, favors, gifts, or anything of value from anyone doing business with the County of Los Angeles ("the County"),

RCP: rcp

1 when, in truth and fact, as defendant SHEPOS then well knew,  
2 defendant SHEPOS had been accepting bribe payments for five or six  
3 years from two individuals doing business with the County.

COUNT TWO

[26 U.S.C. § 7206(1)]

On or about April 14, 2015, in Los Angeles County, within the Central District of California, defendant THOMAS M. SHEPOS ("SHEPOS") willfully made and subscribed to a materially false U.S. Individual Income Tax Return, Form 1040, for the calendar year 2014, which defendant SHEPOS verified by a written declaration that it was made under penalty of perjury, and filed such tax return with the Internal Revenue Service, which defendant SHEPOS did not believe to be true and correct as to every material matter, in that the tax return reported total income of \$109,274 when, in fact, as defendant SHEPOS then knew, he failed to report additional income of \$139,400 for calendar year 2014.

NICOLA T. HANNA  
United States Attorney



Scott Garinger  
Deputy Chief, Criminal Division for

LAWRENCE S. MIDDLETON  
Assistant United States Attorney  
Chief, Criminal Division

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